

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(01) DONALD R. TAYLOR,

Aka: "Dee"

[DOB: 03-14-1984];

(02) CHRISTOPHER A. JEFFERSON,

Aka: "Big AL" and/or "Big A"

[DOB: 12-05-1972];

(03) JAMI L. DEAM,

[DOB: 02-29-1984];

(04) DAVID A. SCOTT,

Aka: "Yella" and/or "Yellow"

[DOB: 02-03-1970];

(05) L. C. LEE,

Aka: "LC"

[DOB: 11-20-1958];

(06) KATHY J. ALEXANDER,

[DOB: 10-16-1955];

(07) JAMES CHALK,

[DOB: 10-04-1989];

(08) AMBER L. BRAKE,

[DOB: 11-15-1990];

(09) SHAWN B. ROBINSON,

[DOB: 11-17-1970];

(10) DAVETTA F. HICKS,

[DOB: 04-03-1987];

No. 18-03007-01/12-CR-S-MDH

COUNT 1

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A)

NLT 10 Years Imprisonment

NMT Life Imprisonment

NMT \$10 million fine

NLT 5 Years Supervised Release

Class A Felony

COUNT 2

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B)

NLT 5 Years Imprisonment

NMT 40 Years Imprisonment

NMT \$5 million fine

NLT 4 Years Supervised Release

Class B Felony

COUNTS 3-6, 9, 11-13

21 U.S.C. § 841(a)(1) and (b)(1)(B)

NLT 5 Years Imprisonment

NMT 40 Years Imprisonment

NMT \$5 million fine

NLT 4 Years Supervised Release

Class B Felony

COUNT 7, 10

21 U.S.C. § 841(a)(1) and (b)(1)(C)

NMT 20 Years Imprisonment

NMT \$1 million fine

NLT 3 Years Supervised Release

Class C Felony

COUNTS 8

21 U.S.C. § 841(a)(1) and (b)(1)(A) and (C)

NLT 10 Years Imprisonment

NMT Life Imprisonment

NMT \$10 million fine

NLT 5 Years Supervised Release

Class A Felony

(11) CORNELL D. BRAXTON,
[DOB: 12-15-1991];
and
(12) JENNIFER A. TURNER,
[DOB: 03-20-1995];

Defendants.

Defendants/Counts:

(01) Taylor: 1, 2
(02) Jefferson: 1, 2, 9, 11, 12, 13
(03) Deam: 1, 11
(04) Scott: 1, 2, 8
(05) Lee: 1-7, 9-10, 14
(06) Alexander: 1, 2
(07) Chalk: 1
(08) Brake: 1, 2
(09) Robinson: 1, 13
(10) Hicks: 1
(11) Braxton: 1
(12) Turner: 1, 5, 6

COUNT 14

18 U.S.C. § 924(c)(1)(A)
NLT 5 Years Imprisonment
(consecutive to Counts 1 and 10)
NMT Life Imprisonment
NMT \$250,000 fine
NLT 5 Years Supervised Release
Class A Felony

\$100 Special Assessment (Each Count)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(A) and § 846

Beginning on an unknown date, but at least as early as December 2, 2014, and continuing to January 23, 2018, in Greene County, in the Western District of Missouri, and elsewhere, the defendants, **DONALD R. TAYLOR**, aka: “Dee”; **CHRISTOPHER A. JEFFERSON**, aka: “Big AL” and/or “Big A”; **JAMI L. DEAM**; **DAVID A. SCOTT**, aka: “Yella” and/or “Yellow”; **L. C. LEE**, aka: “LC”; **KATHY J. ALEXANDER**; **JAMES CHALK**; **AMBER L. BRAKE**; **SHAWN B. ROBINSON**; **DAVETTA F. HICKS**; **CORNELL D. BRAXTON**; and **JENNIFER A. TURNER**; knowingly and intentionally conspired and agreed with each other, and with others known and unknown to the Grand Jury, to distribute 500 grams or more of a

mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; all in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A), and Section 846.

COUNT 2

(Conspiracy to Distribute 100 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Heroin)
21 U.S.C. § 841(a)(1) and (b)(1)(B) and § 846

Beginning on an unknown date, but at least as early as December 2, 2014, and continuing to January 23, 2018, in Greene County, in the Western District of Missouri, and elsewhere, the defendants,, **DONALD R. TAYLOR**, aka: “Dee”; **CHRISTOPHER A. JEFFERSON**, aka: “Big AL” and/or “Big A”; **DAVID A. SCOTT**, aka: “Yella” and/or “Yellow”; **L. C. LEE**, aka: “LC”; **KATHY J. ALEXANDER**; and **AMBER L. BRAKE**; knowingly and intentionally conspired and agreed with each other, and with others, known and unknown to the Grand Jury, to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance; all in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B) and Section 846.

COUNT 3

(Distribution of 5 Grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about February 5, 2016, in Greene County, in the Western District of Missouri and elsewhere, defendant, **L. C. LEE**, aka: “LC”, knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 4

(Distribution of 5 Grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about March 9, 2016, in Greene County, in the Western District of Missouri and elsewhere, defendant, **L. C. LEE**, aka: “LC”, knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 5

(Distribution of 5 Grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B) and 18 U.S.C. § 2

On or about April 6, 2016, in Greene County, in the Western District of Missouri and elsewhere, defendants, **L. C. LEE**, aka: “LC”, and **JENNIFER A. TURNER**, aiding and abetting each other, and others, known and unknown to the Grand Jury, knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 6

(Distribution of 5 Grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B) and 18 U.S.C. § 2

On or about May 3, 2016, in Greene County, in the Western District of Missouri and elsewhere, defendants, **L. C. LEE**, aka: “LC”, and **JENNIFER A. TURNER**, aiding and abetting each other, and others, known and unknown to the Grand Jury, knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 7
(Distribution of Heroin)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about June 1, 2016, in Greene County, in the Western District of Missouri and elsewhere, defendant, **L. C. LEE**, aka: “LC”, knowingly and intentionally distributed heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 8
(Possession with the Intent to Distribute 50 Grams
or more of Methamphetamine and Heroin)
21 U.S.C. § 841(a)(1) and (b)(1)(A) and (C)

On or about June 9, 2016, in Greene County, in the Western District of Missouri and elsewhere, defendant, **DAVID A. SCOTT**, knowingly and intentionally possessed with the intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance, and a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A) and (C).

COUNT 9
(Distribution of 5 Grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B) and 18 U.S.C. § 2

On or about June 27, 2016, in Greene County, in the Western District of Missouri and elsewhere, defendants, **CHRISTOPHER A. JEFFERSON**, aka: “Big Al” and/or “Big A,” and **L. C. LEE**, aka: “LC,” aiding and abetting each other, and others, known and unknown to the Grand Jury, knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 10
(Possession With Intent to Distribute Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about September 15, 2016, in Greene County, in the Western District of Missouri and elsewhere, defendant, **L. C. LEE**, aka: “LC”, knowingly and intentionally possessed with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 11
(Distribution of 5 Grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B) and 18 U.S.C. § 2

On or about October 25, 2016, in Greene County, in the Western District of Missouri and elsewhere, defendants, **CHRISTOPHER A. JEFFERSON**, aka: “Big AL” and/or “Big A”, and **JAMI L. DEAM**, aiding and abetting each other and others, known and unknown to the Grand Jury, knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 12
(Distribution of 5 Grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about March 10, 2017, in Greene County, in the Western District of Missouri and elsewhere, defendant, **CHRISTOPHER A. JEFFERSON**, aka: “Big AL” and/or “Big A”, knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 13

(Distribution of 5 Grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B) and 18 U.S.C. § 2

On or about March 27, 2017, in Greene County, in the Western District of Missouri and elsewhere, defendants, **CHRISTOPHER A. JEFFERSON**, aka: “Big AL” and/or “Big A”, and **SHAWN B. ROBINSON**, aiding and abetting each other and others, known and unknown to the Grand Jury, knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 14

(Possession of Firearm in Furtherance of a Drug Trafficking Crime)
18 U.S.C. § 924(c)(1)(A)

On or about September 15, 2016 in Greene County, in the Western District of Missouri and elsewhere, the defendant, **L. C. LEE**, aka: “LC”, knowingly possessed a firearm, to wit: a Ruger, model LCP, .380 caliber semi-automatic pistol, bearing serial number 371592545, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: conspiracy to distribute 50 grams or more of methamphetamine, as charged in Count 1 of this indictment and Possession of Methamphetamine with Intent to Distribute, as charged in Count 10 of this indictment, all in violation of Title 18, United States Code, Section 924(c)(1)(A).

A TRUE BILL

/s/ Gary Tombridge

FOREPERSON OF THE GRAND JURY

/s/ Abram McGull II

Abram McGull II
Assistant United States Attorney

DATED: 01/23/2018
Springfield, Missouri